

Remarks

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 1-17 are pending in the application, with 1, 9, and 17 being the independent claims. Claims 1, 9 and 17 are sought to be amended. Support for the amendment can be found in the specification FIGs. 4 and 5. These changes introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

Rejections under 35 U.S.C. § 102

The Examiner has rejected claim 1 as being anticipated by U.S. Patent No. 6,522,511 ("John"). Claim 1 has been amended to state the feature "wherein the ESD protection system is connected in series between the pad and the circuit." John is directed to an ESD protection system in parallel with the circuit. For example, FIG. 1 of John shows that current flowing from pad 22, absent an ESD event, transmits directly to the circuit. In the present invention, however, the ESD protection system is not in parallel with the circuit. For example, FIG. 4 shows that current flowing from pad 204 must transmit through ESD protection system 206' before reaching the circuit at node A, regardless of an ESD event. Although pad 204 is directly connected to node B, substantially no current flows through the gate of M4, as is readily known in the art. Therefore, because there is a single current path, ESD protection system 106' is in series

between pad 204 and circuit at node B. This feature is not disclosed by John. For at least this reason, therefore, claim 1 is not anticipated by this reference.

In addition, the Examiner has rejected claims 2-8 as being anticipated by John. These dependent claims necessarily include all features of claim 1 as amended. Because the above-referenced feature is now in claim 1, this feature is likewise present in claims 2-8. Given that this feature is not disclosed in John, this reference fails to disclose all features of each of claims 2-8. These claims are therefore not anticipated by this reference.

The Examiner has also rejected claim 9 as being anticipated by John. Applicants have amended Claim 9 to include the above-mentioned feature. Because this feature is not disclosed by John, claim 9 is not anticipated by this reference.

The Examiner has further rejected claims 10-16 based on John. Claims 10-16, which depend from claim 9, now include this feature as well. Given that this feature is not disclosed by John, claims 10-16 are likewise not anticipated by the reference.

The Examiner has also rejected claim 17 as being anticipated by John. Claim 17 has been amended in a manner similar to claims 1 and 9. Claim 17 now includes the above-mentioned feature. Because this feature is not disclosed in John, claim 17, as amended, is not anticipated by this reference.

Conclusion

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicant believes that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Amdt. dated March 6, 2007 - 8 -
Reply to Office Action of October 6, 2006

Hongwei Wang
Appl. No. 10/668,249

Prompt and favorable consideration of this Amendment and Reply is respectfully
requested.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.



Edward W. Yee
Attorney for Applicant
Registration No. 47,294

Date: MAR. 6, 2007

1100 New York Avenue, N.W.
Washington, D.C. 20005-3934
(202) 371-2600

621796_1.DOC